



STEIN & NIEPORENT LLP
1441 Broadway, Suite 6090
New York, NY 10018
(212) 308-3444 Main
(212) 836-9595 Fax
www.steinllp.com

David Stein: DSTEIN@STEINLLP.COM
(admitted in NY, NJ, PA, DC, IL)

David Nieporent: DNIEPORENT@STEINLLP.COM
(admitted in NY, NJ)


MEMO ENDORSED

August 27, 2024

VIA ECF

Hon. Edgardo Ramos, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Plaintiffs' request for a one week extension to file their motion, until September 4, 2024, is granted. SO ORDERED.



Edgardo Ramos, U.S.D.J.
Dated: 8/28/24
New York, New York

Re: **Aguirre, et al. v. Lees Seoul Cleaners, Inc., et al.**
Case No. 23-cv-4646 (ER) (JLC)


Dear Judge Ramos:

We represent plaintiffs in the above-referenced matter, and we write in regard to the court's order of August 20, 2024, ordering plaintiffs to file a motion for default judgment by today's date.

We intended to do so today,¹ in accordance with Your Honor's Individual Practices. However, as we were preparing the appropriate paperwork, we realized that we had inadvertently neglected to obtain the necessary clerk's certificate of default required by Local Civ. R. 55.1. We therefore respectfully request a one week's extension of the deadline to file plaintiffs' motion, in order to give us time to seek and obtain that document from the clerk's office.

We thank the Court for its attention to this matter. We are available at Your Honor's convenience if the Court has any questions regarding the foregoing.

Respectfully submitted,



David Stein

¹ As stated in our prior communication with the Court, we had intended to seek default judgment against Lees Seoul Cleaners, Inc. and Chung Hyuk Ahn, the two defendants who were able to serve. However, we have since learned that defendant Chung Hyuk Ahn filed for Chapter 7 bankruptcy and was discharged in July 2022. We will therefore be proceeding only against the corporate entity.